Federal Defenders OF NEW YORK, INC.

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Tamara Giwa Executive Director Jennifer L. Brown
Attorney-in-Charge

June 18, 2025

Application DENIED.

By ECF

SO ORDERED. Dated: 6/18/25

Honorable P. Kevin Castel United States District Judge Southern District of New York

> P. Kevin Castel United States District Judge

Re: United States v. Daniel Holmes, 25 Cr. 111 (PKC)

Dear Judge Castel:

I write to respectfully request that the Court permit Daniel Holmes to attend his four-year-old sister's graduation from the 3-K program¹ at P.S. 157 in the Bronx this Friday, June 20, 2025, from 10:00 a.m. to 2:00 p.m. Pretrial Services "object[s] to social requests under home detention." The Government defers to Pretrial Services. As the Court knows, Mr. Holmes is charged with conspiracy and substantive mail-theft offenses and has a next scheduled court date of July 17. His bond conditions include, as relevant, home detention with electronic monitoring. Thank you for your attention to this request.²

Respectfully submitted,

/s/ Jonathan Marvinny
Jonathan Marvinny
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cc: Francesca Piperato, Pretrial Services Getzel Berger, Esq.

¹ "3-K" is full-day education for children commencing the year they turn three.

² Counsel regrets and apologizes for the timing of this request, understanding that tomorrow is a federal holiday.